

Ohio EPA Inter-Office Communication

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DATE: June 11, 1985

FROM: *DMS* Deborah M. Sawyer, TA&WM Section, DSHWM

SUBJECT: Proposed Exclusion of Wastes Generated at Mansfield Products and
Teledyne Monarch

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On Wednesday, May 15, 1985, U.S. EPA proposed to exclude from the list of hazardous waste the F006 waste generated at two Ohio facilities. These facilities are Mansfield Products and Teledyne Monarch.

Mansfield Products submitted a detailed description of their electroplating and wastewater treatment processes. They submitted total constituent and E.P. toxicity test results for arsenic, barium, lead, mercury, selenium, and silver, total oil and grease analyses; and total organic carbon (TOC) analyses. Mansfield's wastewater treatment system consists of reduction of chromic acid rinse wastewater followed by neutralization, addition of lime and polymers (which results in the precipitation of suspended solids, phosphates and metal hydroxides), and pH adjustment. Solids are removed by clarification and are transported to a sludge well and dewatered. This sludge is land disposed at Richland County Landfill.

U.S. EPA believes that Mansfield Products' waste is nonhazardous and should be excluded from hazardous waste control. However, the evaluation of the petition was not conclusive regarding the nickel content of the waste. U.S. EPA will defer their final decision on this waste until the conclusion of a study presently being conducted by the Agency on the reproductive effects of nickel in rats. The results of this study will provide the Agency with a health-based standard for nickel. Until this becomes final, Mansfield Products may continue to handle this waste as non-hazardous under the existing temporary exclusion (46 FR 40158, August 6, 1981).

Teledyne Monarch also petitioned for exclusion of their electroplating waste. In support of their petition, Teledyne has submitted a detailed description of its manufacturing and wastewater treatment processes as well as analytical data to characterize the wastewater treatment sludge in its "as-disposed" condition.

Teledyne's wastewater treatment system consists of oil/water separation followed by chemical coagulation. The solids are removed in clarifiers and are dewatered in a filter press. The dewatered sludge is placed in one of three on-site surface impoundments and is ultimately disposed in a sanitary landfill. In order to get representative samples of the sludge, samples were collected from the filter press and the surface impoundments.

U.S. EPA believes that Teledyne's wastewater treatment sludge is nonhazardous and should be excluded from hazardous waste control. Since this sampling and analyses did not include the waste's nickel content, U.S. EPA will defer their decision on this petition as well.

If you have any questions or comments or need any additional information, please feel free to call me at (614) 462-8423.

DMS/sc

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